

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> , Debtors. ¹	PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)
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**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED
FOR THE HEARING ON SEPTEMBER 11-12, 2019 AT 9:30 A.M. AST³**

Time and Date of Hearing:	Wednesday, September 11, 2019, from 9:30 a.m. to 12:00 p.m., from 1:00 p.m. to 5:00 p.m., and, if necessary, Thursday, September 12, 2019, from 9:30 a.m. to 12:00 p.m., (Atlantic Standard Time)
Location of Hearing:	Honorable Laura Taylor Swain, United States District Court Judge Honorable Judith G. Dein, United States Magistrate Judge Courtroom 3 United States District Court for the District of Puerto Rico, Clemente Ruiz Nazario United States Courthouse, 150 Carlos Chardón Avenue, San Juan, P.R. 00918-1767

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² This Agenda is being amended for the sole purpose of moving ECF No. 7211, filed by Mr. Hein, from Section III (Contested Matters), Item 1, Related Documents to Section III (Contested Matters), Item 1, Responses, per the request of Mr. Hein.

³ Attendees should note that daylight savings time went into effect on March 9, 2019. As such, the hearing will take place at 9:30 a.m. Atlantic Standard Time, which is also 9:30 a.m. Eastern Standard Time, on September 11–12, 2019.

Video Teleconference: The hearing will be broadcast by **video teleconference in Courtroom 17C⁴** of the United States District Court for the Southern District of New York, **Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007**

Copies of Documents: Copies of all documents filed in these title III cases are available free of charge (a) by visiting <https://cases.primeclerk.com/puertorico> or by calling +1 (844) 822-9231, and (b) on the Court's website at <http://www.prd.uscourts.gov>, subject to the procedures and fees set forth therein.

I. STATUS REPORTS:

1. Report from the Oversight Board.

Description: The Oversight Board will report on the (i) general status and activities of the Oversight Board; (ii) anticipated timing for the filing of the Commonwealth's plan of adjustment; (iii) status of the reformulation of Debtors' ADR proposal; (iv) status of PRIDCO's RSA and anticipated Title VI filing; (v) status of the scheduling of ERS issues; and (vi) general status of relations among the Oversight Board and the Commonwealth and federal governments.

2. Report from AAFAF.

Description: The Court asks that AAFAF provide an overview of its current activities and priorities, the recent changes in Commonwealth government leadership, and the general status of relations among the Commonwealth government, the Oversight Board, and the federal government.

3. Remarks from Judge Swain.

II. FEE EXAMINER STATUS REPORT:

1. Fee Examiner's Preliminary Status Report. Fee Examiner's Preliminary Status Report on Continuing Review Process for McKinsey & Company, Inc. as Consultant to the Financial Oversight and Management Board [Case No. 17-3283, ECF No. 8588]

Description: The Fee Examiner's preliminary and interim report regarding its continuing review process for McKinsey & Company, Inc.'s compliance with PROMESA sections 316 and 317.

⁴ Attendees should check the notice board in the lobby of the **New York** courthouse on the morning of the hearing to confirm the courtroom location.

Objection Deadline: N/A

Responses:

A. None.

Replies, Joinders & Statements:

A. None.

Related Documents:

- A. Informative Motion of the Fee Examiner on Review Status of Applications of McKinsey & Company, Inc. as Consultant to the Financial Management and Oversight Board [Case No. 17-3283, ECF No. 8330]
- B. Order Setting Deadline for Further Status Report Regarding Fee Examiner's Review of Applications of McKinsey & Company, Inc. [Case No. 17-3283, ECF No. 8332]

Status: This matter is going forward.

Estimated Time Required: 5 minutes.

III. CONTESTED MATTERS:

1. **Thirteenth Omnibus Objection to Claims.** Puerto Rico Sales Tax Financing Corporation's Thirteenth Omnibus Objection (Non-Substantive) to Duplicate Bond Claims [Case No. 17-3283, ECF No. 4417]

Description: The Puerto Rico Sales Tax Financing Corporation's thirteenth omnibus objection (non-substantive) to duplicate bond claims.

Objection Deadline: February 1, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

- A. Objection, of Individual COFINA Subordinate Bondholder Residing in the 50 States Who Purchased at the Original Offering Prices, to Confirmation of Puerto Rico Sales Tax Financing Corporation ("COFINA") Plan, and Response and Opposition to COFINA's Thirteenth Omnibus Objection to Individual Claim No. 10701 [Case No. 17-3283, ECF No. 4585]
- B. Supplement to Objection, of Individual COFINA Subordinate Bondholder Residing in the 50 States Who Purchased at the Original Offering Prices, to Confirmation of Puerto Rico Sales Tax Financing Corporation ("COFINA") Plan Scheduled for Hearing January 16, 2019, and Response and Opposition to COFINA's Thirteenth Omnibus Objection to Individual Claim No. 10701 [Case No. 17-3283, ECF No. 4595]
- C. Second Supplement to Objection, of Individual COFINA Subordinate Bondholder Residing in the 50 States Who Purchased at the Original Offering Prices, to Confirmation of Puerto Rico Sales Tax Financing Corporation ("COFINA") Plan

Scheduled for Hearing January 16, 2019, and Response and Opposition to COFINA's Thirteenth Omnibus Objection to Individual Claim No. 10701 [**Case No. 17-3283, ECF No. 4673**]

- D. Further Response and Opposition, of Individual COFINA Subordinate Bondholder Residing in the 50 States Who Purchased at the Original Offering Prices, to COFINA's Thirteenth Omnibus Objection to Individual Claim No. 10701, and in Further Opposition to Confirmation of Puerto Rico Sales Tax Financing Corporation ("COFINA") Plan [**Case No. 17-3283, ECF No. 5041**]
- E. Supplement to Response and Opposition, of Individual COFINA Subordinate Bondholder Residing in the 50 States Who Purchased at the Original Offering Prices, to COFINA's Thirteenth Omnibus Objection to Individual Claim No. 10701 [**Case No. 17-3283, ECF No. 6283**]
- F. Response to Request by FOMB for Additional Information Concerning Nature of Constitutional and Other Claims Asserted in Claim No. 10701 [**Case No. 17-3283, ECF No. 7211**]
- G. Response of Individual COFINA Bondholder (Claim No. 10701) to COFINA supplement to its "Thirteenth Omnibus Objection (Non-Substantive) to Duplicate Claims" [**Case No. 17-3283, ECF No. 8427**]

Reply, Joinder & Statement Deadlines: September 3, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and September 4, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

Replies, Joinders & Statements.⁵

- A. Reply of Puerto Rico Sales Tax Financing Corporation to Responses Filed to Thirteenth Omnibus Objection (Non-Substantive) to Duplicate Claims [**Case No. 17-3283, ECF No. 5396**]⁶
- B. Reply of Puerto Rico Sales Tax Financing Corporation to Objection in Support of the Thirteenth Omnibus Objection (Non-Substantive) to Duplicate Claims [**Case No. 17-3283, ECF No. 6367**]⁷
- C. Supplement of Puerto Rico Sales Tax Financing Corporation to Thirteenth Omnibus Objection (Non-Substantive) to Duplicate Claims and Reply to Hein Submissions [**Case No. 17-3283, ECF No. 7958**]⁸

⁵ For the convenience of the Court and parties in interest, footnotes indicate the pleadings the COFINA's respective replies address.

⁶ This reply filed by COFINA addresses the response filed at ECF No. 4585.

⁷ This reply filed by COFINA addresses the following responses filed at ECF Nos. 4585, 4595, and 4673.

⁸ This reply filed by COFINA addresses the following responses filed at ECF Nos. 4585, 4595, 4673, 5041, 6283, and 7211.

- D. Reply of Puerto Rico Sales Tax Financing Corporation in Support of Supplement of Puerto Rico Sales Tax Financing Corporation to Thirteenth Omnibus Objection (Non-Substantive) to Duplicate Claims [**Case No. 17-3283, ECF No. 8590**]⁹
- E. AAFAF's Joinder in the Reply of Puerto Rico Sales Tax Financing Corporation in Support of Supplement of Puerto Rico Sales Tax Financing Corporation to Thirteenth Omnibus Objection (Non-Substantive) to Duplicate Claims [ECF No. 8590] [**Case No. 17-3283, ECF No. 8591**]

Related Documents:

- A. Order Directing Parties to Meet and Confer Regarding Scheduling of Hearing on the Thirteenth Omnibus Objection to Claims as to Claim of Peter C. Hein [**Case No. 17-3283, ECF No. 5052**]
- B. Informative Motion of Puerto Rico Sales Tax Financing Corporation Regarding Scheduling of Hearing on the Thirteenth Omnibus Objection to Claims as to Claim of Peter C. Hein [**Case No. 17-3283, ECF No. 5142**]
- C. Order Granting In Part Puerto Rico Sales Tax Financing Corporation's Thirteenth Omnibus Objection (Non-Substantive) to Duplicate Bond Claims [**Case No. 17-3283, ECF No. 6117**]
- D. Order Granting In Part Puerto Rico Sales Tax Financing Corporation's Thirteenth Omnibus Objection (Non-Substantive) To Duplicate Bond Claims [**Case No. 17-3283, ECF No. 7113**]

Status: This matter is going forward.

Estimated Time Required: 20 minutes.

- 2. **Sixtieth Omnibus Objection to Claims.** The Commonwealth of Puerto Rico's Sixtieth Omnibus Objection (Non-Substantive) to Deficient Claims [**Case No. 17-3283, ECF No. 8287**]

Description: The Commonwealth of Puerto Rico's sixtieth omnibus objection (non-substantive) to deficient claims.

Objection Deadline: August 27, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

- A. Response to Sixtieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Deficient Claims [**Case No. 17-3283, ECF No. 8386**]

⁹ This reply filed by COFINA addresses the response filed at ECF No. 8427.

Reply, Joinder & Statement Deadlines: September 3, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and September 4, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

Replies, Joinders & Statements:

- A. Reply of the Commonwealth of Puerto Rico to Response filed by UBS Trust Company to Sixtieth Omnibus Objection (Non-Substantive) to Deficient Claims [**Case No. 17-3283, ECF No. 8594**]

Related Documents:

- A. None.

Status: This matter is going forward.

Estimated Time Required: 15 minutes.

- 3. **Sixty-Second Omnibus Objection to Claims.** The Commonwealth of Puerto Rico's Sixty-Second Omnibus Objection (Substantive) to GDB Bondholder Claims [**Case No. 17-3283, ECF No. 8290**]

Description: The Commonwealth of Puerto Rico's sixty-second omnibus objection (substantive) to GDB bondholder claims.

Objection Deadline: August 27, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

- A. Response to Debtor's Sixty-Second Omnibus Objection to Claims (Substantive) to Claims Based on Investments in Mutual Funds filed by Manuel A. Torres Diaz [**Case No. 17-3283, ECF No. 8578**]

Reply, Joinder & Statement Deadlines: September 3, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and September 4, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

Replies, Joinders & Statements:

- A. Reply of the Commonwealth of Puerto Rico to Responses Filed by Manual A. Torres Diaz to Sixty-Second Omnibus Objection (Substantive) to GDB Bondholders Claims [**Case No. 17-3283, ECF No. 8596**]

Related Documents:

- A. None.

Status: This matter is going forward.

Estimated Time Required: 15 minutes.

4. **Sixty-Fourth Omnibus Objection to Claims.** The Commonwealth of Puerto Rico's Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Investments in Mutual Funds [Case No. 17-3283, ECF No. 8297]

Description: The Commonwealth of Puerto Rico's sixty-fourth omnibus objection (substantive) to claims based on investments in mutual funds.

Objection Deadline: August 27, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

- A. Response to Debtor's Sixty-Fourth Omnibus Objection to Claims (Substantive) to Claims Based on Investments in Mutual Funds filed by Gloria L. Diaz Lopez and Ernesto Rodriguez [Case No. 17-3283, ECF No. 8524]
- B. Response to Debtor's Sixty-Fourth Omnibus Objection to Claims (Substantive) to Claims Based on Investments in Mutual Funds filed by Jesus Librada Sanz [Case No. 17-3283, ECF No. 8555]
- C. Response to Debtor's Sixty-Fourth Omnibus Objection to Claims (Substantive) to Claims Based on Investments in Mutual Funds filed by Jesus Librada Sanz [Case No. 17-3283, ECF No. 8556]
- D. Response in Opposition to Debtor's Sixty-Fourth Omnibus Objection to Claims Based on Investments in Mutual Funds [Case No. 17-3283, ECF No. 8562]
- E. Response in Opposition to Debtor's Sixty-Fourth Omnibus Objection to Claims Based on Investments in Mutual Funds [Case No. 17-3283, ECF No. 8563]
- F. Response to Debtor's Sixty-Fourth Omnibus Objection to Claims (Substantive) to Claims Based on Investments in Mutual Funds filed by Alberto J. Aristizabal Ocampo [Case No. 17-3283, ECF No. 8572]
- G. Reply in Opposition to Debtor's Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Mutual-Fund Investments filed by Patrick D. O'Neill [Case No. 17-3283, ECF No. 8600]
- H. Reply in Opposition to Debtor's Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Mutual-Fund Investments filed by Helvia S. Caparros Santos [Case No. 17-3283, ECF No. 8601]
- I. Reply in Opposition to Debtor's Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Mutual-Fund Investments filed by Edlin S. Buitrago Huertas [Case No. 17-3283, ECF No. 8602]
- J. Reply in Opposition to Debtor's Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Mutual-Fund Investments filed by Carmen M. Huertas [Case No. 17-3283, ECF No. 8603]

- K. Reply in Opposition to Debtor's Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Mutual-Fund Investments filed by Carmen M. Huertas and Jose Buitrago [**Case No. 17-3283, ECF No. 8604**]
- L. Reply in Opposition to Debtor's Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Mutual-Fund Investments filed by Jose Buitrago [**Case No. 17-3283, ECF No. 8605**]
- M. Response to Objection to Claim filed by Jorge A. Diaz Mayoral and Juan A. Frau Escudero [**Case No. 17-3283, ECF No. 8609**]

Reply, Joinder & Statement Deadlines: September 3, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and September 4, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

Replies, Joinders & Statements:

- A. Omnibus Reply of the Commonwealth of Puerto Rico to Responses Filed to Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Investments in Mutual Funds [**Case No. 17-3283, ECF No. 8608**]
- B. Second Omnibus Reply of the Commonwealth of Puerto Rico to Responses Filed to Sixty-Fourth Omnibus Objection (Substantive) to Claims Based on Investments in Mutual Funds [**Case No. 17-3283, ECF No. 8646**]

Related Documents:

- A. Motion to Submit Certified Translations [**Case No. 17-3283, ECF No. 8648**]

Status: This matter is going forward.

Estimated Time Required: 20 minutes.

- 5. **Sixty-Seventh Omnibus Objection to Claims.** The Puerto Rico Highways and Transportation Authority's Sixty-Seventh Omnibus Objection (Non-Substantive) to Duplicate and Deficient Claims [**Case No. 17-3283, ECF No. 8302**]

Description: The Puerto Rico Highways and Transportation Authority's sixty-seventh omnibus objection (non-substantive) to duplicate and deficient claims.

Objection Deadline: August 27, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

- A. Response to Debtor's Sixty-Seventh Omnibus Objection (Non-Substantive) to Duplicate and Deficient Claims filed by Aracelia Torres Irizarry [**Case No. 17-3283, ECF No. 8534**]

Reply, Joinder & Statement Deadlines: September 3, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and September 4, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

Replies, Joinders & Statements:

A. None

Related Documents:

A. Reply of the Puerto Rico Highways and Transportation Authority to Response Filed by Aracella Torres Irizarry to Sixty-Seventh Omnibus Objection (Non-Substantive) to Duplicate and Deficient Claims [**Case No. 17-3283, ECF No. 8597**]

Status: This matter is going forward.

Estimated Time Required: 15 minutes.

6. **Motion to Compel Brought by Individual COFINA Bondholder.** Motion to Compel Brought by Individual COFINA Bondholder [**Case No. 17-3283, ECF No. 8487**]

Description: Motion of Peter Hein, an individual CONFINA bondholder, to compel responses to interrogatories and disclosure of specific documents from the Financial Oversight and Management Board for Puerto Rico and COFINA.

Objection Deadline: August 27, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

A. Objection of the Puerto Rico Sales Tax Financing Corporation to Motion to Compel Brought by Individual COFINA Bondholder [**Case No. 17-3283, ECF No. 8553**]

Reply, Joinder & Statement Deadlines: September 3, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and September 4, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

Replies, Joinders & Statements:

A. AAFAF's Joinder in the Objection of the Puerto Rico Sales Tax Financing Corporation to Motion to Compel Brought by Individual COFINA Bondholder [ECF No. 8553] [**Case No. 17-3283, ECF No. 8558**]

B. Reply in Further Support of Motion to Compel Brought by Individual COFINA Bondholder (Moving Papers Filed at Docket#8487) **Case No. 17-3283, ECF No. 8626**

Related Documents:

A. None

Status: This matter is going forward.

Estimated Time Required: 20 minutes.

IV. ADJOURNED MATTERS:

1. **FOMB and AAFAF's Motion to Dismiss Insurers' Motion to Appoint a Receiver.** The Financial Oversight and Management Board and AAFAF's Memorandum of Law in Support of Motion Pursuant to Fed. R. Civ. P. 12(b)(6) to Dismiss Insurers' Motion for Relief from the Automatic Stay to Seek Appointment of a Receiver [ECF No. 975] [**Case No. 17-4780, ECF No. 1233**]

Description: The FOMB and AAFAF jointly move to dismiss the motion for relief from stay in PREPA's Title III case [ECF No. 975], filed by National Public Finance Guarantee Corporation, Assured, and Syncora Guarantee Inc. seeking the appointment of a receiver.

Objection Deadline: August 7, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

A. None.

Reply, Joinder & Statement Deadlines: August 30, 2019 at 4:00 p.m. (Atlantic Standard Time)

Replies, Joinders & Statements:

A. None.

Related Documents:

- A. Order Setting Briefing Deadlines in Connection with Financial Oversight and Management Board and AAFAF's Motion Pursuant to Fed. R. Civ. P. 12(b)(6) to Dismiss Insurers' Motion for Relief from the Automatic Stay to Seek Appointment of a Receiver [**Case No. 17-4780, ECF No. 1241**]
- B. Corrected Urgent Motion to Extend and Establish Certain Deadlines Applicable to (1) The Joint Motion of PREPA and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012(A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement [ECF No. 1235]; and (2) Oversight Board and AAFAF's Motion Pursuant to Fed. R. Civ. P. 12(B)(6) to Dismiss Insurers' Motion for Relief from the Automatic Stay to Seek Appointment of a Receiver [ECF No. 1233] [**Case No. 17-4780, ECF No. 1250**]
- C. Order Extending Certain Deadlines Applicable to Financial Oversight and Management Board and AAFAF's Motion Pursuant to Fed. R. Civ. P. 12(b)(6) to Dismiss Insurers' Motion for Relief from the Automatic Stay to Seek Appointment of a Receiver [ECF No. 1233] [**Case No. 17-3283, ECF No. 7071, Case No. 17-4780, ECF No. 1254**]
- D. Order Extending Certain Deadlines Applicable to Financial Oversight and Management Board and AAFAF's Motion Pursuant to Fed. R. Civ. P. 12(b)(6) to

Dismiss Insurers' Motion for Relief from the Automatic Stay to Seek Appointment of a Receiver [Case No. 17-3283, ECF No. 7701, Case No. 17-4780, ECF No. 1398]

E. Urgent Joint Motion of All Parties to Extend Deadlines Re: Motion to Dismiss [Case No. 17-3283, ECF No. 8181, Case No. 17-4780, ECF No. 1488]

F. Order Extending Deadlines Applicable to Financial Oversight and Management Board and AAFAF's Motion Pursuant to Fed. R. Civ. P. 12(b)(6) to Dismiss Insurers' Motion for Relief from the Automatic Stay to Seek Appointment of a Receiver (ECF No. 1233) Case No. 17-3283, ECF No. 8200, Case No. 17-4780, ECF No. 1493]

Status: This matter has been adjourned to the October 30, 2019 omnibus hearing.

Estimated Time Required: N/A

2. **AAFAF's Objection to Claim of the United States Department of the Treasury/Internal Revenue Service.** Puerto Rico Fiscal Agency and Financial Advisory Authority's objection to proofs of claim of the United States Department of the Treasury/Internal Revenue Service (Claims Nos. 168648 and 16885) [Case No. 17-3283, ECF No. 7419, Case No. 17-3284, ECF No. 643]

Description: Puerto Rico Fiscal Agency and Financial Advisory Authority's objection to proofs of claim of the United States Department of the Treasury/Internal Revenue Service (Claims Nos. 168648 and 16885) filed against the Puerto Rico Sales Tax Financing Corporation.

Objection Deadline: August 9, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

A. None.

Reply, Joinder & Statement Deadlines: September 4, 2019 at 4:00 p.m. (Atlantic Standard Time).

Replies, Joinders & Statements:

A. None

Related Documents:

- A. Stipulation and Agreed Order (A) Withdrawing Proofs of Claim of the United States Department of the Treasury/Internal Revenue Service (Claim Nos. 168648 and 168885); (B) Deeming Previously Filed Objection to Apply to Amended IRS Proof of Claim (Claim No. 169423); (C) Extending Deadline to Respond to the Objection; and (D) Adjourning Hearing to Consider the Objection [Case No. 17-3283, ECF No. 7927, Case No. 17-3284, ECF No. 662]

Status: This matter has been adjourned to the October 30, 2019 omnibus hearing.

Estimated Time Required: N/A

3. **AMPR's Motion for Relief from Stay.** Motion for Relief from Automatic Stay [Case No. 17-3283, ECF No. 3914]

Description: Asociación de Maestros de Puerto Rico, and its Union, Asociación de Maestros de Puerto Rico-Local Sindical, both of which are affiliates of the American Federation of Teachers, seek relief from the automatic stay to pursue action against the Department of Education of the Commonwealth, the Secretary of the Department of Education of the Commonwealth, Julia Keleher in her official capacity, and the Commonwealth of Puerto Rico. The action seeks a declaratory judgment concerning causes of action for breach and/or impairment of contractual and vested property rights.

Objection Deadline: October 27, 2018 at 4:00 p.m. (Atlantic Standard Time).

Responses:

- A. Objection of the Commonwealth to Motion for Relief from Automatic Stay filed by Asociación de Maestros de Puerto Rico, and its Union, Asociación de Maestros de Puerto Rico-Local Sindical [Case No. 17-3283, ECF No. 4038]

Reply, Joinder & Statement Deadlines: October 19, 2018 at 4:00 p.m. (Atlantic Standard Time).

Replies, Joinders & Statements:

- A. Movants' Reply to Objection of the Commonwealth to Motion for Relief From Automatic Stay Filed by AMPR and AMPR-LS [Case No. 17-3283, ECF No. 4071]

Related Documents:

- A. Order Scheduling Briefing of Motion for Relief from Automatic Stay [Case No. 17-3283, ECF No. 3916]
- B. Urgent Joint Motion for Extension of Deadlines [Case No. 17-3283, ECF No. 3960]
- C. Order Extending Deadlines under Order Scheduling Briefing of Motion for Relief from Automatic Stay [Case No. 17-3283, ECF No. 3966]
- D. Unopposed Motion of Commonwealth of Puerto Rico for Leave to File Sur-Reply to Movants' Reply to Objection of the Commonwealth to Motion for Relief from Automatic Stay Filed by AMPR and AMPR-LS [Case No. 17-3283, ECF No. 4107]
- E. Order Granting Unopposed Motion of Commonwealth of Puerto Rico for Leave to File Sur-Reply [Case No. 17-3283, ECF No. 4449]
- F. Joint Informative Motion regarding Hearing on Motion for Relief from Stay filed by Asociación de Maestros de Puerto Rico [Case No. 17-3283, ECF No. 4941]
- G. Joint Status Report Regarding Motion for Relief from Stay Filed by Asociación de Maestros de Puerto Rico [Case No. 17-3283, ECF No. 8075]

Status: This matter has been adjourned to the October 30, 2019 omnibus hearing.

Estimated Time Required: N/A.

4. **Ambac's Motion to Compel Compliance with Orders Authorizing 2004 Examinations.**

Ambac Assurance Corporation's Motion to Compel Compliance with the Court's December 15, 2017 and February 26, 2018 Orders regarding the Urgent Renewed Joint Motion of the Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., the Mutual Fund Group, and National Public Finance Guarantee Corporation for Order Authorizing Rule 2004 Examination [**Case No. 17-3283, ECF No. 7505**]

Description: Ambac Assurance Corporation's motion to compel the Commonwealth of Puerto Rico, AAFAF, and the Financial Oversight and Management Board for Puerto Rico to comply with the Court's orders of December 15, 2017 and February 26, 2018 as they pertain to requests for information regarding the Commonwealth's pension liabilities, as set forth in the Rule 2004 motions dated September 12, 2017 (ECF. No. 1283) and November 28, 2017 (ECF. No. 1870).

Objection Deadline: July 9, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

- A. Respondents' Omnibus Opposition to Ambac Assurance Corporation's Motion to Compel [ECF NO. 7505] and Ambac Assurance Corporation's Pension Motion [ECF NO. 7507] [**Case No. 17-3283, ECF No. 7895**]

Reply, Joinder & Statement Deadlines: July 16, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and July 17, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

Replies, Joinders & Statements:

- A. Joinder of Ad Hoc Group of Constitutional Debtholders to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [**Case No. 17-3283, ECF No. 7531**]
- B. Joinder of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [**Case No. 17-3283, ECF No. 7588**]
- C. Joinder of Financial Guaranty Insurance Company to Ambac Assurance Corporation's Motion to Compel Compliance with the Court's December 15, 2017 and February 26, 2018 Orders regarding the Urgent Renewed Joint Motion of the Ad Hoc Group of General Obligation Bondholders, Ambac Assurance Corporation, Assured Guaranty Corp., Assured Guaranty Municipal Corp., the Mutual Fund

Group, and National Public Finance Guarantee Corporation for Order Authorizing Rule 2004 Examination [Dkt. # 7505] [**Case No. 17-3283, ECF No. 7674**]

- D. Joinder of the Ad Hoc Group of General Obligation Bondholders to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [**Case No. 17-3283, ECF No. 7714**]
- E. Limited Joinder of Official Committee of Unsecured Creditors in Ambac Assurance Corporation's Motion to Compel Seeking Discovery Pursuant to Rule 2004 [Dkt. No. 7505] [**Case No. 17-3283, ECF No. 7883**]

Related Documents:

- A. Order Adjourning Hearing on Pension Discovery Motions [**Case No. 17-3283, ECF No. 8447**]
- B. Second Joint Status Report of Movant Ambac Assurance Corporation and Respondents the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority With Respect to The Pensions Discovery Motions [**Case No. 17-3283, ECF No. 8633**]
- C. Joint Urgent Motion by Ambac Assurance Corporation, the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority, Seeking an Order Granting an Adjournment of the Hearing of the Pensions Discovery Motions [**Case No. 17-3283, ECF No. 8634**]

Status: This matter has been adjourned to the October 30, 2019 omnibus hearing.

Estimated Time Required: N/A

- 5. **Ambac's Motion for Order Authorizing 2004 Discovery Concerning Pension Liabilities.** Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities [**Case No. 17-3283, ECF No. 7507**]

Description: Ambac Assurance Corporation's motion for entry of order authorizing discovery of the Financial Oversight and Management Board for Puerto Rico as representative of the Commonwealth of Puerto Rico, the Puerto Rico Fiscal Agency and Financial Advisory Authority, and the Commonwealth of Puerto Rico under Bankruptcy Rule 2004 concerning pension liabilities.

Objection Deadline: July 9, 2019 at 4:00 p.m. (Atlantic Standard Time).

Responses:

- A. Respondents' Omnibus Opposition to Ambac Assurance Corporation's Motion to Compel [ECF No. 7505] and Ambac Assurance Corporation's Pension Motion [ECF No. 7507] [**Case No. 17-3283, ECF No. 7895**]

Reply, Joinder & Statement Deadlines: July 16, 2019 at 4:00 p.m. (Atlantic Standard Time) for all parties other than the Debtors or Statutory Committees and July 17, 2019 at 4:00 p.m. (Atlantic Standard Time) for Debtors and Statutory Committees.

Replies, Joinders & Statements:

- A. Joinder of Ad Hoc Group of Constitutional Debtholders to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [**Case No. 17-3283, ECF No. 7531**]
- B. Joinder of Assured Guaranty Corp. and Assured Guaranty Municipal Corp. to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [**Case No. 17-3283, ECF No. 7588**]
- C. Joinder of Financial Guaranty Insurance Company to Ambac Assurance Corporation's Motion for Entry of Order Authorizing Discovery Under Bankruptcy Rule 2004 Concerning Pension Liabilities [Dkt. # 7507] Discovery [**Case No. 17-3283, ECF No. 7675**]
- D. Joinder of the Ad Hoc Group of General Obligation Bondholders to Ambac Assurance Corporation's Requests for Rule 2004 Discovery [**Case No. 17-3283, ECF No. 7714**]
- E. Limited Joinder of Official Committee of Unsecured Creditors in Ambac Assurance Corporation's Motion Regarding Pension Liabilities Seeking Discovery Pursuant to Rule 2004 [Dkt. No. 7507] [**Case No. 17-3283, ECF No. 7880**]
- F. Ambac Assurance Corporation's Omnibus Reply in Further Support of the Pensions Discovery Motions [**Case No. 17-3283, ECF No. 8230**]

Related Documents:

- A. Order Adjourning Hearing on Pension Discovery Motions [**Case No. 17-3283, ECF No. 8447**]
- B. Second Joint Status Report of Movant Ambac Assurance Corporation and Respondents the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority With Respect to The Pensions Discovery Motions [**Case No. 17-3283, ECF No. 8633**]
- C. Joint Urgent Motion by Ambac Assurance Corporation, the Financial Oversight and Management Board for Puerto Rico, the Commonwealth of Puerto Rico, and the Puerto Rico Fiscal Agency and Financial Advisory Authority, Seeking an Order

Granting an Adjournment of the Hearing of the Pensions Discovery Motions [Case No. 17-3283, ECF No. 8634]

Status: This matter has been adjourned to the October 30, 2019 omnibus hearing.

Estimated Time Required: N/A

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Dated: September 10, 2019
San Juan, Puerto Rico

Respectfully submitted,

/s/ Martin J. Bienenstock

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